

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
) No. 15 CR 315
v.)
) Judge Thomas M. Durkin
JOHN DENNIS HASTERT)

**SECOND JOINT MOTION FOR AN EXTENSION OF TIME
FOR DEFENDANT TO FILE PRETRIAL MOTIONS**

The United States of America and Defendant John Dennis Hastert, by and through their respective attorneys, hereby move this Honorable Court for a second two-week extension of time for Defendant to file pretrial motions. In support thereof, the parties state as follows:

1. During a status hearing on July 14, 2015, this Honorable Court set a briefing schedule requiring that Defendant file his pretrial motions on or before August 31, 2015.
2. Thereafter, on August 24, 2015, this Honorable Court granted Defendant's unopposed request for an extension of time to file pretrial motions. Pursuant to the revised briefing schedule, Defendant's pretrial motions were to be filed by September 14, 2015.
3. On September 10, 2015, the parties filed a joint motion for extension of time. As the parties explained in the joint motion, the

Government and Defendant have been engaged in discussions regarding certain issues that Defendant may raise in his pretrial motions. The parties explained that the extension, if granted, would allow the parties time to address these issues and may therefore obviate the need for Defendant to raise, and the Court to address, these issues. The Court granted the parties' motion and ordered that Defendant file his pretrial motions by September 28, 2015.

4. The parties are continuing to engage in the above-referenced discussions but require additional time to address the issues.

5. For the foregoing reasons, the Government and Defendant respectfully request that this Court extend the time for Defendant to file pretrial motions to October 13, 2015. In addition, the parties request that the status hearing currently set for November 16, 2015 be stricken and reset for November 19, 2015, or as soon thereafter as this Honorable Court prefers.

WHEREFORE, the Government and Defendant John Dennis Hastert respectfully request that this Honorable Court grant the parties' Second Joint Motion for an Extension of Time for Defendant to File Pretrial Motions, and extend the schedule as follows:

1. Defendant's pretrial motions are to be filed by October 13, 2015.
2. The Government's response is due by November 3, 2015.

3. Defendant's reply is due by November 17, 2015.
4. Status hearing is stricken and reset for November 19, 2015, or as soon thereafter as this Honorable Court prefers.

Respectfully submitted,

By: /s/ Thomas C. Green

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September 21, 2015